

Moncavage, Carissa

From: Moncavage, Carissa
Sent: Tuesday, July 28, 2015 9:49 AM
To: Abraham, Sara Reji
Cc: Patel, Pravin; Trulear, Brian; Gaul, Andrew; Cruz, Francisco
Subject: RE: Aqua PA Media STP (PA0024121 A-2)

Sarah,

According to the Memorandum of Agreement (MOA) between the U.S. Environmental Protection Agency (EPA) Region III and the Pennsylvania Department of Environmental Protection (PADEP), the EPA has reviewed the draft National Pollutant Discharge Elimination System (NPDES) permit for:

Aqua Pennsylvania Wastewater Inc (PA0024121 A-2)

Also Known As: Aqua PA Media Borough STP

NPDES ID: PA0024121 A-2

EPA-Received: July 13, 2015

EPA received the first draft for Media Borough STP on May 11, 2015 and provided comments to DEP on June 10, 2015. I have completed a limited review of the revised draft based on the site specific copper criterion and DEP's response to my earlier comments and offer no new comments at this time.

If any changes are made to the draft permit and/or fact sheet, please submit those changes to me.

Thank you,

Carissa Moncavage

Water Protection Division
NPDES Permits Branch (mail code 3WP41)
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Ph: (215) 814-5798
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From: Abraham, Sara Reji [mailto:saabraham@pa.gov]
Sent: Friday, July 10, 2015 11:43 AM
To: Moncavage, Carissa
Subject: RE: Aqua PA Media STP (PA0024121 A-2)

Hi Carissa:

We just issued a revised draft for this permit amendment, you will get it through NMS.

(i) The new pa bulletin includes the WER study.

(ii) The WER study was conducted for Total Recoverable Copper. In the conclusion section of the report the WER was referred to as Dissolved Copper WER. This was a typo. We have confirmed this with the consultant and corrected it.

Also we have discussed the applicability of the dissolved Vs total WER in the PENTOXSD with our CO staff. It seems like it doesn't change anything in the calculation. The way I used the WER of 4.6 as Criteria Modifier in the PENOXSD is still correct.

Thank you

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From: Moncavage, Carissa [<mailto:Moncavage.Carissa@epa.gov>]
Sent: Wednesday, June 10, 2015 4:30 PM
To: Abraham, Sara Reji
Cc: Trulear, Brian; jnewbold@pa.gov
Subject: Aqua PA Media STP (PA0024121 A-2)

According to the Memorandum of Agreement (MOA) between the U.S. Environmental Protection Agency (EPA) Region III and the Pennsylvania Department of Environmental Protection (PADEP), the EPA has reviewed the draft National Pollutant Discharge Elimination System (NPDES) permit for:

Aqua Pennsylvania Wastewater Inc (PA0024121 A-2)
Also Known As: Aqua PA Media Borough STP
NPDES ID: PA0024121 A-2
EPA-Received: May, 11 2015

EPA has chosen to perform a limited review of the draft permit based on the WER study and the site specific effluent limit for copper. As a result of our limited review, we offer the following comments:

- 1) 40 CFR Part 131 requires water quality standards revisions and *supporting analyses* be public noticed. Can you provide me with documentation of the public notice of the WER study? If not, the current public notice will have to be amended to include the WER study.
- 2) Our water quality standards team reviewed the WER study and found the study was conducted correctly, however, it was noted that the report indicates that the calculated WER of 4.6 was developed for total recoverable copper but the study was for dissolved copper. Can you confirm the WER was for dissolved copper and thereby confirm the criteria modifier of 4.6 applied to the dissolved water quality criteria (indicated in PENTOX) was applied correctly?

Please address the above, and provide me with any changes to the draft permit and/or fact sheet, if necessary.

Regards,

Carissa Moncavage
Water Protection Division

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